

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

UNITED STATES OF AMERICA)	
)	
v.)	CR. NO. 2:05-cr-216-MEF
)	
TIMOTHY WILLIAMS)	

MOTION FOR DOWNWARD DEPARTURE

Comes now the United States of America, by and through Leura Garrett Canary, United States Attorney for the Middle District of Alabama, and pursuant to the United States Sentencing Commission, Guidelines Manual, Section 5k1.1, and Title 18, United States Code, Section 3553(e), respectfully requests this Honorable Court to downwardly depart three(3) levels, in the sentence that would otherwise be imposed on Defendant Timothy Williams, and as reasons therefore, submits the following:

1. The United States herein states that Defendant Timothy Williams has provided substantial assistance in investigations of federal narcotics, firearms, counterfeiting and fraud law violations in the Middle District of Alabama.

2. The United States submits that it will consider a further motion for downward departure pursuant to Federal Rules of Procedure, Rule 35, should Defendant Timothy Williams offer further cooperation to federal agents and the United States, and be ready, willing and able to testify in trials of the violators of federal law.

Wherefore, premises considered, the United States moves this Honorable Court for a downward departure from the calculated guideline range. This motion seeks a departure of three (3) levels.

Respectfully submitted this the 27th day of July, 2006.

LEURA GARRETT CANARY
UNITED STATES ATTORNEY

/s/ Susan R. Redmond
SUSAN R. REDMOND
Assistant United States Attorney
One Court Square, Suite 201
Montgomery, Alabama 36104
Telephone: (334) 223-7280
Fax: (334) 223-7135
susan.redmond@usdoj.gov

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CERTIFICATE OF SERVICE

I hereby certify that on July 27, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Tiffany B. McCord.

Respectfully submitted,

LEURA GARRETT CANARY
UNITED STATES ATTORNEY

/s/ Susan R. Redmond
SUSAN R. REDMOND
Assistant United States Attorney
One Court Square, Suite 201
Montgomery, Alabama 36104
Telephone: (334) 223-7280
Fax: (334) 223-7135
susan.redmond@usdoj.gov